

EXHIBIT 5

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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

IN RE JOHNSON & JOHNSON)
TALCUM POWDER PRODUCTS)MDL NO.
MARKETING, SALES PRACTICES AND)16-2738 MAS RLS
PRODUCTS LIABILITY LITIGATION)
_____)

DEPOSITION OF MICHELE L. COTE, PH.D., M.P.H.

The deposition upon oral examination of
MICHELE L. COTE, PH.D., M.P.H., a witness produced
and sworn before Wendi Kramer Sulkoske, Notary Public
in and for the County of Boone, State of Indiana,
taken on behalf of the Defendant at Faegre Drinker
Biddle & Reath, 300 North Meridian Street, Suite
2500, Indianapolis, Marion County, Indiana on March
21, 2024, pursuant to the Applicable Rules of
Procedure.

1 MR. JAMES: Counsel, we would request that
2 you produce the supplemental invoice when it's
3 available.

4 MS. PARFITT: Of course.

5 Q I see in the top invoice the cover sheet of 11/2.

6 Can you open that one for me, the 11/2 cover
7 sheet?

8 A Yes.

9 Q I see that the first entry that is invoiced is
10 from March 15, do you see that?

11 A Yes, I do.

12 Q That says Introductory Meeting.

13 Do you see that?

14 A Uh-huh.

15 Q Is that yes?

16 A Yes. I'm sorry.

17 Q No worries. Is that the first call that you had
18 with counsel about working on this litigation?

19 A I actually believe I spoke briefly with Michelle
20 sometime -- I received an email, like, the end of
21 January. We spoke briefly over the phone.

22 Then we have -- I thought about it some. We
23 set up a call for March. So, yes.

24 Q And then I see that on 3/23 you invoiced for 120
25 minutes of first literature review.

1 Do you see that?

2 A Yes.

3 Q And then on 3/27 you have invoiced for a review
4 history call, is that correct?

5 A Yes, that is correct.

6 Q At the time on 3/27 had you reached the opinion
7 that talc as a perineal talc use is a general
8 cause of ovarian cancer?

9 A I had not, no.

10 Q When did you reach that opinion?

11 A At some point later this fall during my broader
12 review of multiple lines of evidence. At this
13 point in March I had really just focused on the
14 epidemiological literature.

15 I felt confident that there would be enough
16 there for me to come to an opinion. So I agreed
17 to kind of take on this work.

18 Q Okay. That first call was with Ms. Parfitt,
19 correct?

20 A I believe so. I believe Leigh may have been on
21 that call as well.

22 Q Ms. O'Dell?

23 A Yes, Ms. O'Dell.

24 Q Was anyone else on that call?

25 A Not to my recollection, no.